



DEPARTMENT OF DISABILITIES, AGING AND INDEPENDENT LIVING

Division of Licensing and Protection 103 South Main Street, Ladd Hall Waterbury VT 05671-2306 http://www.dail.vermont.gov Voice/TTY (802) 241-2345

To Report Adult Abuse: (800) 564-1612

Fax (802) 241-2358

December 16, 2011

Larry Goetschius, Administrator Addison County Home Health & Hospice Inc Po Box 754 Middlebury, VT 05753

Provider ID #:477014

Dear Mr. Goetschius:

Enclosed is a copy of your acceptable plans of correction for the survey and complaint investigation conducted on **November 14, 2011**.

Follow-up may occur to verify that substantial compliance has been achieved and maintained.

Sincerely,

Pamela M. Cota, RN Licensing Chief

mlaMCJaRN

PC:ne

Enclosure



PRINTED: 11/23/2011 RECEIVED FORM APPROVED Division of Division of Licensing and Protection UEU | 2 11 STATEMENT OF DEFICIENCIES (X3) DATE SURVEY (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION AND PLAN OF CORRECTION COMPLETED **IDENTIFICATION NUMBER:** Licensing and A. BUILDING Protection B. WING VT477014 11/14/2011 NAME OF PROVIDER OR SUPPLIER STREET ADDRESS, CITY, STATE, ZIP CODE **PO BOX 754** ADDISON COUNTY HOME HEALTH & HOSPICI MIDDLEBURY, VT 05753 SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (X4) ID ID (X5) PRÉFIX (EACH DEFICIENCY MUST BE PRECEDED BY FULL (EACH CORRECTIVE ACTION SHOULD BE COMPLETE **PREFIX** TAG REGULATORY OR LSC IDENTIFYING INFORMATION) CROSS-REFERENCED TO THE APPROPRIATE DATE TAG DEFICIENCY) H 001 **Initial Comments** H 001 SS=A An unannounced on-site complaint investigation for the Designation and Operation of Home Health Agencies was conducted by the Division of Licensing and Protection on 11/14/11. There were State regulatory violations. H 645 6.12(a) Organization, Services and Administration H 645 SS=D VI. Organization, Services and Administration A home health agency shall keep a log of Action to correct the deficiency. all complaints. The log shall include the date of Issue presented to management team to discuss the the complaint, name of complainant, subject of seriousness of the issue and plan for correcting the the complaint, person assigned and the date and deficiency (see attached minutes). resolution of the complaint. QA committee will meet and complete the 11/16/11 following: Review and revise our policy and (a) The home health agency shall respond to procedure for patient complaints (see all complaints, whether received orally or in attached revised policy). writing, within 2 business days. Redefine what constitutes a complaint (see 11/29/11 attached QA minutes). Identify a more effective and efficient 11/29/11 method of documenting patient This REQUIREMENT is not met as evidenced complaints. (see attached QA minutes). Develop and implement a computerized 11/29/11 database for patient complaints (see Based on interview and record review, the agency attached QA minutes). failed to assure all complaints were logged and Present changes in the patient complaint In process investigated in a timely manner for 1 client (Client process to clinical staff. Emphasizing all #1) Findings include: complaints will be tracked (see attached minutes). OA Coordinator to review patient 12/07/11 1. Per record review the agency failed to complaints weekly. QA Committee to document on the complaint log the name, date, review patient complaints monthly and/or person assigned, subject, and resolution of a no less than quarterly. complaint by client #1. Per review on 11/14/11 of In process

Division of Licensing and Protection

STATE FORM

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If continuation sheet 1 of 2

Michel Hadela ANNS Of Continuation sheet 1 of 2

the Agency's complaint log there were no entries

for the year 2011 and 1 entry in 2010, not related

to patient's concerns. Per a memo and letter

(LNA) supervisor wrote "there are several

dated 02/17/11 the Licensed Nursing Assistant

complaints about your (to a specific LNA) abrupt communication. recently one of your patients

Review completed process with the management

Health Aide Coordinator, Choices for Care Coordinator) to management for review of the

revised process.

team. Invite additional program coordinators (Home

12/07/11

and 12/14/11

PRINTED: 11/23/2011 FORM APPROVED

Division of Licensing and Protection STATEMENT OF DEFICIENCIES (X3) DATE SURVEY (X1) PROVIDER/SUPPLIER/CLIA (X2) MULTIPLE CONSTRUCTION AND PLAN OF CORRECTION COMPLETED IDENTIFICATION NUMBER: A. BUILDING B. WING VT477014 11/14/2011 STREET ADDRESS, CITY, STATE, ZIP CODE NAME OF PROVIDER OR SUPPLIER **PO BOX 754** ADDISON COUNTY HOME HEALTH & HOSPICI MIDDLEBURY, VT 05753 (X4) ID SUMMARY STATEMENT OF DEFICIENCIES PROVIDER'S PLAN OF CORRECTION (EACH DEFICIENCY MUST BE PRECEDED BY FULL **PREFIX PREFIX** (EACH CORRECTIVE ACTION SHOULD BE COMPLETE REGULATORY OR LSC IDENTIFYING INFORMATION) TAG CROSS-REFERENCED TO THE APPROPRIATE DATE TAG DEFICIENCY) H 645 Continued From page 1 H 645 complained that you left [patient] alone in the bathroom....another patient complained you left Measures put in place to assure the deficient practice does not recur. wet towels etc in the bathroom, this upset 1. Implementation of a computerized version of the [patient] enough to cancel services completely." complaint form to assure increased compliance. Per interview on 11/14/11 at 9:50 AM the Human Discussions with managers and clinical staff as Resource Director stated that s/he was not aware discussed above. of the concerns from patients until after the LNA's Regularly scheduled review of patient complaints by QA Coordinator, QA Committee and Management termination from employment for unprofessional Team. behavior. Per interview at 10:25 AM the Quality Assurance Director confirmed that the complaints How corrective action will be monitored. 1. QA Coordinator will: should be documented in the complaint log using Review patient complaints weekly. the Agency's complaint form, which included b. Remind managers on a consistent 12/05/11 unprofessional behavior and suspected basis to be documenting patient neglect/theft. S/he confirmed these concerns_ complaints. were not on the complaint log and "staff have not On going QA Committee will review patient complaints been filling it (log) out ". monthly and/or no less than quarterly. QA Coordinator will summarize patient complaints and present to Management Team monthly and/or no less than quarterly. 12/05/11 H645 POC occepted 12/15/11 Sman J. Emmans

Division of Licensing and Protection STATE FORM

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If continuation sheet 2 of 2

Addison County Home Health and Hospice Management Team Minutes – November 16, 2011

Attendees: Becky Bonvouloir, Paige Gallo, Larry Goetschius, Lorraine Richards, Michele Hadeka,

Marcia Wheeler

Absent: Diane Cushman, Lee Ann Goodrich, Cindy Paquette, Sharon Thompson

EHR Implementation

• Day sheet process reviewed.

- Reviewed staff who were ready to transition to McKesson
- W/E staff would be the last to transition
- Revise day sheets for clinical staff to reference episode # not admission #.
- There will be a W/E laptop assigned. Betsy will do OASIS and eventually may do admissions. Action: Determine who will need laptops. Review financials

State Investigation

- The state came in to investigate two complaints:
 - 1. Pt. LW requested that her son be able to be in the home during visits.
 - 2. Pt complaint that a staff member was stealing medications.
- Both incidences were well documented.
- We failed to fill out a Patient Complaint on the missing medication event. It will be added to the Performance Improvement Plan.
 - 1. We need to define what a complaint is.
 - 2. Re-evaluate our process for handling complaints by QA committee
 - 3. Present new process to staff
 - 4. Put the complaint form on the computer so it is easy to fill out.

Action: Wait to hear from the state.

Holiday Event

- Hold a Holiday Breakfast like last year and give out holiday gift.
- Holiday gift will be a canvas bag (similar to 4 years ago) with our new logo and small gifts. Action: Paige will order the canvas bags. Paige and Michele will shop for the goodies. We need a date for the breakfast.

The next meeting of the Management Team will be Wednesday, November 30th, at 9am in the large conference room.

Agenda

EHR Implementation
Date for Holiday Breakfast
Performance Review Workshop



Addison County Home Health and Hospice, Inc.

Quality Assurance/Improvement Committee Meeting

Date: November 29, 2011

Time: 2:00 to 4:00 p.m.

Present: Marcia Wheeler, RN (Hospice Coordinator), Lorraine Richards, RN and Becky

Bonvouloir, RN (Team Leaders), Michele Hadeka, RNMS (QA/QI Coordinator)

Absent: LeeAnn Goodrich, RN (Team Leader), Sharon Thompson, RN (Clinical

Director)

Recorder: Michele Hadeka, RNMS

I. Patient Complaint – Policy and Process

Michele Hadeka reviewed with the committee the recent investigation by the State of Vermont, Division of Licensing and Protection. She stated that in the discussion she had via phone with the investigator, Susan Emmons, RN, that as a result of the investigation we (the QA Committee) will do the following:

- 1. Review and revise our policy and procedure for documenting and resolving patient complaints.
- 2. Redefine what constitutes a complaint.
- 3. Identify more effective and efficient means of documenting patient complaints.
- 4. Discuss the issue with the management team (done on 11/16/2011).
- 5. Present and discuss the issue with the clinical staff.
- 6. Add this improvement project to our 2011-2012 Performance Improvement Plan.

What constitutes a complaint? Our discussion around what is a complaint was interesting in that all the issues that we believe are complaints are already listed on our current patient complaint form and the problem isn't knowing what a complaint is. Our problem is that we have not been documenting patient complaints appropriately.

The primary reason that we have not been documenting appropriately appears to be the statement in the current policy which says; "Complaints **do not** need to be documented when received and resolved the same day the complaint was received" (See current policy). Members stated that because of this statement we as managers have proceeded to resolve issues (the majority of which are minor) but that we have not then followed through and documented them.

Michele Hadeka, RNMS stated that in her discussion with Susan Emmons, RN, She had said we really should be documenting all complaints because then we could more easily track potential issues with problem employees or patient who



call the office often for minor complaints like "the aide put the shower chair in the wrong place."

Decision: Members agreed that **we will start documenting all complaints** and to do that we need to revise the policy and identify a more efficient means of documenting. We agreed that the statement about not needing to document those complaints resolved the same day will be removed from the policy.

Decision: We agreed to make some minor revisions on the current complaint form. In addition, we agreed to have a template of the current patient complaint form made for use on the computer. All complaints will be kept in a single file within the computer which will replace the current paper version of the complaint log. We decided that for multiple complaints from the same patient/family that the initial complaint would be documented on the complaint form and that subsequent complaints would be documented in an abbreviated fashion on an addendum to the original. The addendum would identify the date, the issue, the resolution and the individual completing the documentation. This addendum would facilitate tracking of potential problem prone situations as well as potential personnel issues.

Marcia Wheeler asked that as we make revisions in our current policy that we state that "when field staff receives complaints on home visits that they refer the patient/family to the appropriate management level person and so the manager can directly receive the information related to the patient concerns. Members agreed that this is more appropriate than the field staff bringing the concern as second hand information to the manager.

Marcia Wheeler also suggested that we have a discussion with the management team regarding complaints that may/will come to us via our website. Currently those go to the executive director. Is that where they should go? Should they come directly to the clinical director? These are questions we will bring to the management team.

Decision: Updates to the policy/procedures Michele Hadeka will make the revisions as discussed for the policy and the actual complaint form. She will also attempt to design an addendum.

Decision: The QA Coordinator will review the complaint file weekly and present to the QA Committee monthly but no less than quarterly.

Addison County Home Health & Hospice, Inc.



Patient Complaints

POLICY:

Patient concerns and complaints shall be received, investigated and resolved in an efficient and professional manner. All patients shall be treated with respect and dignity with conflict resolution as the primary goal. Patient complaints may be received from patients, families, caregivers, physicians, etc.

PURPOSE:

To assure that a mechanism for receiving, investigating and resolving patient concerns/complaints is in place.

PROCEDURE:

- 1. Patient concerns and complaints will be directed to the clinical director, team leaders or designee, E.g. Home Health Aide Coordinator, Choices for Care Coordinator, weekend supervision.
- 2. Patient concerns and complaints will be documented on the Agency patient complaint form. Field staff who receive a patient complaint will provide the patient/family with the name and phone number of the clinical director, team leader or designee to facilitate the reporting of the complaint.
- 3. All patient concerns and complaints will be addressed within 48 business hours.
- 4. The clinical director, team leader or designee will investigate the concern/complaint by interviewing the staff involved.
- 5. The process for resolving the conflict will be explained to the patient, in clear understandable language. Provisions will be made, on an individual basis, for patients who may have a speech or hearing impairment.
- 6. Resolution of a concern/complaint will occur on an individual basis. The executive director, clinical director, team leader or designee will respond to the specific complaint in writing if appropriate. The written response will outline the steps to be taken for the resolution of the complaint
- 7. Patients or family members not satisfied with the proposed resolution shall receive an explanation from the executive director, clinical director, team leader or designee of what other options are available for resolution of the conflict.
- 8. The patient will be given the following hotline numbers on admission to agency services:
 - a. VAHHA Ombudsman Program 1-800-713-0893 ~and~

b. Vermont State Home Health Hotline 1-800-564-1612

9. In the event a patient concern or complaint requires it to be reported to a specific agency, e.g. adult or child protective services, local or state police, agency staff will comply.

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10. Patient concerns/complaints will be reviewed by the Q.A. coordinator weekly. The QA Committee will review the patient complaints monthly and/or no less than quarterly.

Professional Advisory Committee: 06/03, 07,04, 10/05, 02/06, 03/08, 03/09, 03/10, 03/11

Board Approved: 06/03, 11/11/03,05/09

Addison County Home Health & Hospice, Inc. Patient Complaint Form



Record patient complaints received by the agency in the field, by telephone, in writing, or in person at the Agency. Please indicate the program and staff involved in the Patient Name: complaint. Check all applicable. DOB: / Homecare Staff: RN Staff Program: Patient Family Member PT ∏мsw Hospice Primary Care Provider Other Therapy Physician MCH High Tech Пот HHA Complaint Reported by: □ PCA SLP Complainant Phone Number: Homemaker Office Staff Medicaid Waiver Business Office Management Other: Other: Please categorize concern/complaint in one of the following 3 categories: 1. Service Issues: Actions Requested by complainant: Length of Visit Choice of Provider Time of Day Personality Conflict Staff Inconsistency Communication Theft Inability to Staff Visit Abuse/Neglect Missed Visit(s) Signature of Staff Receiving Complaint Quality or Adequacy of Care Date Action Taken: / / Unprofessional Behavior Reduction in Service/Agency Discretion Action Taken: Other (explain): 2. Payment Issues: Payer Does Not Cover Cost of Care Billing for Services Not Provided Other (explain): 3. System Issues: Resolved to Complainant's satisfaction within a seven (7) day period from when the original complaint was made? Ineligible for Services Waiting List for Services Yes No, Explain: Other (explain): Date reviewed by QA Coordinator Date Reviewed by QA Committee

This is a temporary vense in of an addention

Addison County Home Health and Hospice, Inc. Patient Complaint Addendum

<u>Date</u>	Complaint	Action Requested	Resolution	Taken by
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Addison County Home Health and Hospice, Inc.

Staff Conference Minutes

Date: December 7, 2011

Present: See attached attendance sheet

Conducted by: Sharon Thompson, RN, Clinical Director

Recorder: Michele Hadeka, RNMS

I. Patient Complaint / Plan of Correction—"ATTENTION ALL STAFF"

Sharon stated that our Agency had recently had an investigation by the State of Vermont, The Division of Licensing and Protection for a patient complaint. She turned the meeting over to Michele Hadeka – QA Coordinator to present to staff a summary of the investigation and its resolution.

Michele stated that on November 14, 2011, an unannounced on-site complaint investigation for the Designation and Operation of Home Health Agencies was conducted by the Division of Licensing and Protection. On the day of the on-site visit, a record review was done and interviews were conducted by the investigator. Unfortunately, several individuals (QA Coordinator, Clinical Director and a specific department supervisor) were not present due to extenuating circumstances.

As the investigator proceeded she was not able to find documentation of the complaint in the Agency complaint log and the documentation the specific department supervisor had regarding the incident, follow up and resolution were in the supervisor's office but were not able to be located by the Executive Director.

Michele said the investigator was kind enough to call and speak directly with her and the specific department supervisor on November 15, 2011. Michele stated that she was extremely frustrated as she had not been made aware of the situation when it happened and as a result did not have any information in the complaint log.

Michele also stated that our old policy stated that if a complaint was received and resolved the same day (we had interpreted this as 24 hours) that this is why complaints have not been documented. (Most complaints we have do get resolved in 24 hours.) The investigator pointed out that by having this statement in our policy we are missing a lot of information that ideally should be tracked and could be useful to us. For example, repeated complaints could show that a specific employee is late for patient visits often. Or tracking could help us with patients who call repeatedly for very small things like – the HHAide put the shower chair in the wrong place.

Michele stated that the investigator is right and we do need to rethink our process. She said the QA Committee met last week and revised the policy (policy and complaint form distributed to all staff). The statement about not needing to document a complaint if resolved in 24 hours has been removed. Michele called attention to the procedure part of the policy #2 that says "Field Staff who receive a patient complaint will provide the patient/family with the name and phone number of the clinical director, team leader or designee to facilitate the reporting of a complaint." Thus, allowing the patient to have direct access to the appropriate management personnel.

Several staff raised the question regarding what they should do if the patient doesn't make the phone call and still complains. In that instance bring it to the attention of the appropriate supervisor. Sharon Thompson also said that if staff see or hear complaints about our staff regarding serious issues such as alcohol or drug use to **please** report this to a supervisor immediately.

Michele stated that in this investigative process the specific department supervisor also spoke with the investigator by phone and provided her with her written documentation of the process and resolution.

(continued on next page)



(b)

Several employees asked if there was a complaint about them; would they be notified? Sharon and Michele absolutely; a team leader or appropriate manager would talk with the individual employee.

The conclusion, to this incident is that a Plan of Correction has been developed, written and is being implemented. Today's presentation/discussion is part of that Plan of Correction as is the revision of the policy and making the complaint form and process more efficient. The Plan of Correction is due at Licensing and Protection tomorrow.

The Plan of Correction will be posted on the bulletin board in the copy area for all employees to review.

II. PT/INR Results

Lorraine Richards talked about how we are currently using our PT/INR fax sheet. She said that many doctor's offices are using it with no problem; they complete the orders and fax back. However, there are a couple of offices that want to use their own order sheet when faxing orders to us.

So, when calling PT/INR results to an MD office, <u>ask</u> if they want you to fax the results on our fax sheet as well. If they say no they will generate the order then do not proceed with the fax.

Several nurses including Kim Norton, RN said that this is what they are doing and it is working well. Some nurses said they have still been faxing. Michele pointed out if we send a fax and the MD office responds on their own order sheet, the people who track our faxes (office staff) don't always understand that the order has come back and they resend the original fax. So, see the directions above in bold print and proceed as described.

III. OASIS – Pain Assessment

Kim DeGray, RN (Utilization Review Nurse) reminded clinicians that when answering the OASIS question M1240 "Has the patient had a formal pain assessment?" You can not answer yes to that question if you have not completed the preceding pain assessment. If not completed you need to mark no. However, a pain assessment should be completed on all patients.

OASIS Depression

Suzette LaVallee, RN raised a question regarding how to present the scoring of the question on depression M1730 for our interim orders we obtain to fulfill question M2250. Kim DeGray stated that the score that should be provided is a total of the two questions. There is some confusion by staff regarding the way the score is presented on our interim orders. Michele said she would have this corrected on our interim orders.

IV. Introduction of New Employee

Trish Meyer, RN has been hired to work with the Hospice Team; she comes to us from Massachusetts and has a great deal of experience. Please welcome her.

V. Christmas Surprise

Sharon and Michele gave away gift certificates to the Water Fall Day Spa to 10 clinicians. (The Waterfall Day Spa is owned by two of our former employees, Sara Daly, PT and Laurie Webb, SLP.) Michele asked random staff to pick a number between 1 and 45. She assigned numbers to the sign in sheet after everyone had signed in.

The winners were:

iic williers were.	
# 6 Trish Meyer, RN	# 32 Melodie Huizenga, PT
# 14 Gerry Kolaczewski, LPN	# 35 Walterine Masterson, RN
# 20 Jen Oxford, OT	# 10 Val Doria, RN
# 23 Carla Tighe, PT	# 41 Amy Curtis, MSW
# 29 Mary Daly, RN	# 18 Kevin Griffin, PT

Michele announced there will be a Christmas/Holiday breakfast on Thursday morning, November 15, in the large conference room.

VI. Stephanie Stoddard asked about Lee Ann Goodrich, RN, Team Leader. Her surgery was yesterday and doing well. Her daughter is recovering also very nicely. Alisa Breau, SLP, is also recovering from surgery. Gift baskets will be put together for both Lee Ann and Alisa; Walt Masterson will oversee.



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Licensing and Protection

December 8, 2011

Suzanne Leavitt, RN, MS Assistant Director Department of Disabilities, Aging and Independent Living Division of Licensing and Protection 103 South Main St., Ladd Hall Waterbury, VT 05671-2306

Dear Ms. Leavitt,

Enclosed you will find a Plan of Correction submitted to you from Addison County Home Health and Hospice, Inc. for your approval.

In addition to the Plan of Correction you will find several attachments with supporting documentation. Those documents are:

- 1) Minutes of a Management meeting on 11/16/11
- 2) Minutes of a Quality Assurance meeting on 11/29/11
- 3) Revised policy on patient complaints
- 4) Revised form for patient complaints
- 5) Addendum to patient complaint form
- 6) Minutes of Staff Conference meeting on 12/07/11

Please feel free to contact me if there are further questions at (802) 388-7259.

Sincerely,

The chile Hacleka JNUS

Michele Hadeka, RNMS

Quality Assurance Coordinator